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IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13

:

Oiana N. Futrell : No. 19-16328-ELF

Debtor :

ANSWER TO MOTION OF U.S. BANK NATIONAL ASSOCIATION FOR RELIEF FROM THE AUTOMATIC STAY

- 1. Admitted.
- 2. Admitted.
- 3. Admitted.
- 4. Admitted.
- 5. Admitted.
- 6. Admitted payments have been missed. Debtor suffered some financial strain as a result of COVID-19 and was not aware she needed to request a formal forbearance for payments missed during that time. Debtor is seeking a Loan Modification.
- 7. Admitted payments were missed. Debtor is seeking a Loan Modification.
- 8. Admitted payments were missed. Debtor is seeking a Loan Modification for the chance to cure the total arrears owed to U.S. Bank N.A.
- 9. Denied. Debtor is seeking a Loan Modification and respectfully requests the chance to catch up.
- 10. No response required.

WHEREFORE, the Debtor respectfully requests that the Movant's Motion for Relief be DENIED.

/s/ David M. Offen
David M. Offen
Attorney for Debtor(s)

Dated:8/26/20

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CERTIFICATE OF SERVICE

The following has been served by electronic mail:

Rebecca Solarz on behalf of U.S. Bank National Association bkgroup@kmllawgroup.com

/s/ David M. Offen
David M. Offen
Attorney for Debtor

Dated: 8/26/20